

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth.

ORDER GRANTING FOUR HUNDRED TWENTIETH
OMNIBUS OBJECTION (SUBSTANTIVE) OF THE COMMONWEALTH
OF PUERTO RICO TO NO LIABILITY CLAIMS FILED BY AEELA MEMBERS

Upon the *Four Hundred Twentieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to No Liability Claims Filed by AEELA Members* [ECF No. 20046] (the “Four Hundred Twentieth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated February 4, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtor, as more fully set forth in the Four Hundred Twentieth

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Twentieth Omnibus Objection.

Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Twentieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Twentieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Twentieth Omnibus Objection (collectively, the “Claims to Be Disallowed”) asserting claims for which the Debtors are not liable; and the Court having determined that the relief sought in the Four Hundred Twentieth Omnibus Objection is in the best interest of the Debtors, their creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Twentieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Twentieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 20046 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Twentieth Omnibus Objection

Four Hundred Twentieth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	NIEVES HERNANDEZ, HILDA C/SANTA ANA E25 SANTA ELVIRA CAGUAS, PR 00725	6/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	112768	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
2	NIEVES HERNANDEZ, HILDA E-25 SANTA ANA SANTA ELVIRA CAGUAS, PR 00725	6/28/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	121044	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
3	OQUENDO VAZQUEZ, GERSON 28 CALLE CESAR CONCEPCION CAYEY, PR 00736	6/26/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	98212-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
4	RODRIGUEZ NIEVES, DAISY URB VILLA CAPRI CALLE VERONA 1172 RIO PIEDRAS, PR 00924	5/18/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	13451-1	\$ 68,079.93
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
5	VELEZ CISCO, AURELIO HC 2 BOX 11275 LAS MARIAS, PR 00670	7/29/2019	17 BK 03283-LTS	Commonwealth of Puerto Rico	170039-1	Undetermined*
Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Asociacion de Empleados Del ELA (AEELA), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever.						
						TOTAL \$ 68,079.93*